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HERIBERTO G. REYNOSO CHAVEZ
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9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,)

No. CR-06-00823 DLJ

12 Plaintiff,)

**STIPULATION AND ~~PROPOSED~~
ORDER RE: COURT DATE**

13 v.)

14 HERIBERTO G. REYNOSO CHAVEZ)
15 CARLOS NUNEZ PEREZ,)

Date: January 25, 2008
Time: 11:00 a.m.

16 Defendants.)
17

18 United States of America, by and through its counsel of record, Assistant United Attorney Kimberly
19 A. Briggs, and defendants, Heriberto G. Reynoso Chavez and Carlos Nunez Perez, through counsel,
20 Juliana Drous and Ruben Munoz hereby stipulate as follows:

21 Defendants are presently scheduled to appear before this Court on January 11, 2208. The parties
22 are in the process of attempting to resolve this matter via plea agreements. Progress has been made, but
23 due to illness of counsel and the holidays, additional time is needed to complete the negotiations. It is thus
24 respectfully requested that the court appearance be continued for two weeks, to January 25, 2008, at 11:00
a.m.

25 The parties agree that time continues to be excluded under the Speedy Trial Act, 18 U.S.C. §
26 3161(h)(8)(B)(iv) from January 11, 2008 until January 25, 2008. The ends of justice served by granting
27 a continuance outweigh the best interests of the public and the defendants in a speedy trial. A continuance
28

1 is necessary to allow continuity of counsel and reasonable time necessary for effective preparation, taking
2 into account the exercise of due diligence.

3 DATED: January 9, 2008

4 /s/
JULIANA DROUS
Attorney for Defendant
HERIBERTO G. REYNOSO CHAVEZ

6 DATED: January 9, 2008

7 /s/
RUBEN MUNOZ
Attorney for Defendant
CARLOS NUNEZ PEREZ

8 DATED: January 9, 2008

9 /s/
KIMBERLY M. BRIGGS
Asst. United States Attorney

11 IT IS SO ORDERED.

13 DATED: January 9, 2008

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HON. D. LOWELL JENSEN
Senior District Court Judge